

### **REMARKS**

Claims 1-41 are pending in the application. Claims 1-41 stand rejected. The rejections are traversed as discussed herein.

#### ***Drawings***

The drawings stand objected to under 37 CFR 1.85(h)(5) because modules 208 and 216 of figure 8 show the same view. Applicant submits herewith a corrected drawing sheet of figure 8. As disclosed in lines 7-17 of page 16 of Applicant's specification, module 216 of corrected figure 8 reads "Home Computer Processes Home Device (Or Software Application) Command From Second User." The other figures are also being supplied herewith as requested by the Examiner.

#### ***Claim Rejections - 35 USC §§ 102 and 103***

Claims 1 and 27 stand rejected under 35 USC § 102(b) as being anticipated by Dunn et al. (US Patent No. 5,999,612). Claims 1-41 stand rejected under 35 USC § 103(a) as being unpatentable over Dunn and in view of Vander Molen (US Patent No. 4,520,576). Applicant transposes the rejections.

Claim 1 recites in combination with its other limitations that a home-based client-side media computer for use within a home includes first and second connection ports for allowing a speech-based conversation to occur respectively over a home-based broadband connection and over a public switched telephone network. The home-based client-side media computer also includes a "plurality of speech engines that recognize speech and

synthesize speech to allow the speech-based conversations to occur over the first connection port and the second connection port." As described in the background section of Applicant's specification, a prior art client-side home-based client-side media computer typically does not have the capability recited in claim 1, such as being equipped with home-based broadband and PSTN connections as well as with speech recognition and speech synthesis engines. Such capability was typically placed in servers and other type devices.

Applicant agrees with the Examiner that the Dunn reference does not disclose claim 1's "plurality of speech engines that recognize speech and synthesize speech to allow the speech-based conversations to occur over the first connection port and the second connection port," and thus the Dunn reference cannot serve as a § 102 rejection for the pending claims. Moreover, the Dunn reference does not even disclose a plurality of speech engines that can recognize speech and synthesize speech. For example, modules 54-57 of figure 4 of the Dunn reference contain no functionality to recognize speech, such as to recognize/understand the spoken words of a speaker and to perform different operations based upon the recognized words.

Applicant respectfully disagrees with the Examiner that the Vander Molen reference discloses "the plurality of speech engines" limitations of claim 1. More specifically, the Vander Molen reference, whether considered alone or in combination with the other cited references, does not disclose, suggest or motivate that a plurality of speech engines be used on a home-based client-side media computer to recognize speech and synthesize speech in order to allow the speech-based conversations to occur over the first connection port and the second connection port as required by claim 1 in

combination with its other limitations. As an illustration, Vander Molen discloses that a home appliance itself, such as a clothes dryer, contains a speech recognition module and a speech synthesis module 52 (see Vander Molen at col. 4, lines 7-23). Nowhere does Vander Molen disclose that a home-based client-side media computer itself include a plurality of speech engines as required by claim 1.

Vander Molen does not have a plurality of speech engines on a home-based client-side media computer, but instead places a speech recognition module and a speech synthesis module in the appliance itself. This is pictorially shown in figure 1 of Vander Molen which shows an audio speaker and microphone at 48 being included with the clothes dryer 10 (see Vander Molen at col. 3, lines 62-65). Vander Molen actually teaches away from the home-based client-side media computer configuration of claim 1 since Vander Molen teaches that an appliance should have a speech recognition module and a speech synthesis module. This would mean, according to Vander Molen, that if five appliances were to be controlled by speech, then each of the five appliances would have to have speech recognition modules and speech synthesis modules. This could result in many disadvantages, such as resulting in multiple maintenance problems. In contrast, claim 1 requires that a home-based client-side media computer include functionality that such prior art systems teach to push outside of a home-based client-side media computer. Due to such significant differences, claim 1 is allowable over Vander Molen reference whether considered alone or in combination with the other cited references.

Claim 27 recites, in combination with its other limitations, "recognizing speech and synthesizing speech to allow the speech-based conversation to occur over the Internet

network and the public switched telephone network." Vander Molen does not have a plurality of speech engines on a home-based client-side media computer, but instead places a speech recognition module and a speech synthesis module in the appliance itself. Due to such significant differences, claim 27 is allowable over Vander Molen whether considered alone or in combination with the other cited references.

### CONCLUSION

For the foregoing reasons, Applicant respectfully submits that the claims are in a condition for allowance, and therefore the Examiner is respectfully requested to pass this case to issuance.

Respectfully submitted,

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